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October 30, 2019

Honorable Loretta A. Preska  
 United States District Court  
 Southern District of New York  
 500 Pearl Street  
 New York, NY 10007

Re: ***Giuffre v. Dershowitz, Case No. 19-Civ-3377-LAP***  
**Request for Extension of Time to File Answer and Counterclaims**

Dear Judge Preska,

Defendant Alan Dershowitz (“Mr. Dershowitz”) respectfully writes the Court to request an extension to his time file his Answer and Counterclaims. Although this request was made within the letter filed on October 24, 2019 [Dkt. No. 71] seeking a Rule 2.A Pre-Motion Conference, in the abundance of caution we present this request separately herein.

As stated in the October 24, 2019 letter, Mr. Dershowitz seeks limited pre-answer discovery that is necessary to prepare his Answer and Counterclaims, to wit, the unsealing of the Plaintiff’s deposition transcripts and exhibits from prior actions. Mr. Dershowitz further requested that his Answer and Counterclaims be filed within seven (7) days of the production of the pre-answer discovery, if ordered.

Your Honor endorsed the letter instructing counsel for Mr. Dershowitz to, in sum and substance, confer with Plaintiff’s counsel regarding the request, and for Plaintiff’s counsel to file their objection, if any, by November 4, 2019. [Dkt. No. 72] As of the filing of this letter, we have yet to receive notice of incoming counsel for the Plaintiff, so we have been unable to confer.

Pursuant to F.R.C.P. Rule 12(a)(4)(A) Mr. Dershowitz’s responsive pleading is due on October 31, 2019. Due to the pending request before the Court, as detailed above, we request an extension of the time for Mr. Dershowitz to file his responsive pleading.

Mr. Dershowitz respectfully requests that he be permitted to file his Answer and Counterclaims within seven (7) days of the production of the limited pre-answer discovery, as detailed within his October 24, 2019 letter, if so ordered. If said request is denied, then Mr. Dershowitz requests seven (7) days to file his Answer and Counterclaims from the date of the order denying his request.

Respectfully Submitted,

Imran H. Ansari

CC: All Counsel of Record via ECF